

January 29, 2020

Via ECF

The Honorable Robert W. Lehrburger,  
United States District Court for the  
Southern District of New York,  
500 Pearl Street,  
New York, New York 10007-1312.

Re: *Chen-Oster, et al. v. Goldman, Sachs & Co., et ano.*  
No. 10 Civ. 6950 (AT) (RWL) (S.D.N.Y.)

Dear Judge Lehrburger:

Pursuant to Rule I.A of Your Honor's Individual Practices, the parties jointly submit an errata sheet detailing proposed corrections to the transcript of the January 16, 2020 conference. (ECF No. 940.)

Respectfully submitted,

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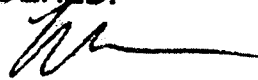
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**SO ORDERED:**

  
1/30/2020  
HON. ROBERT W. LEHRBURGER  
UNITED STATES MAGISTRATE JUDGE

**ERRATA SHEET**

***Chen-Oster v. Goldman, Sachs & Co, No. 10-cv-6950***  
**Transcript of January 16, 2020 Hearing**  
**Before The Honorable Robert W. Lehrburger**

<i>Page</i>	<i>Line</i>	<i>Change</i>
3	18	Insert period after <unknown> <i>Reason:</i> End of the statement
7	17	Change <there> to <their> <i>Reason:</i> Transcription error
9	10	Change <by> to <but> after <processes> <i>Reason:</i> Transcription error
20	14	Change <conceivable> to <procedural> <i>Reason:</i> Transcription error
22	16	Delete period after <voided> <i>Reason:</i> Statement continues on next line.
23	18	Change <DI's> to <Dias> <i>Reason:</i> Correcting declarant's name.
24	16	Change <Callahan> to <O'Callaghan> <i>Reason:</i> Correcting case name.
27	17	Change <agreement> to <argument> <i>Reason:</i> Transcription error
29	25	Change <of> to <or> after <pattern> <i>Reason:</i> Transcription error
30	1	Delete <or> <i>Reason:</i> Transcription error
30	20	Change <preponderance> to <predominance> <i>Reason:</i> Transcription error
31	20	Change <records> to <record> <i>Reason:</i> Transcription error
32	1	Change <and> to <to> <i>Reason:</i> Transcription error

<i>Page</i>	<i>Line</i>	<i>Change</i>
32	5	Change <and> to <in> prior to <some> to read as follows: <some generic statements, <b>in</b> some answers> <i>Reason:</i> Transcription error
32	14	Change <classes> to <class members> <i>Reason:</i> Transcription error
32	21	Change <they're> to <we're> and change the period following <playbook> to a comma, to read as follows: <So we're operating from the same playbook, I want> <i>Reason:</i> Transcription error
32	23	Add <what> between <meaning> and <the> and delete comma following <"our"> to read as follows: <understanding was, "our" meaning <b>what</b> the plaintiffs' understanding> <i>Reason:</i> Transcription error
32	24	Add comma after <was> to read as follows: <was, of the class size when we filed our class brief.> <i>Reason:</i> Transcription error
33	5	Add <that's> between <But> and <the> to read as follows: <But <b>that's</b> the number> <i>Reason:</i> Transcription error
33	14	Add <a> between <including> and <case> and change <that's> to <that> to read as follows: <including <b>a</b> case <b>that</b> involved guided manager discretion> <i>Reason:</i> Transcription error
33	15	Change <the> to <their> <i>Reason:</i> Transcription error
33	19	Change <in> to <and> within the phrase <in concurrence with> to read as follows: <arbitration in its objections to the R&R or objections <b>and</b> concurrence with the R&R.> <i>Reason:</i> Transcription error
34	11	Change <in> to <after> to read as follows: <five years <b>after</b> the class certification motion> <i>Reason:</i> Transcription error
35	1	Change <take> to <look> <i>Reason:</i> Transcription error

<i>Page</i>	<i>Line</i>	<i>Change</i>
35	7	Add <in> between <9,> and <every> to read as follows: <So if you look at slide number 9, <b>in</b> every single one of> <i>Reason:</i> Transcription error
35	8	Add <it> between <raised> and <in> to read as follows: <the defendants raised <b>it</b> > <i>Reason:</i> Transcription error
35	13	Change <Issen> to < <i>Eisen</i> > <i>Reason:</i> Spelling and italicization of case name
35	16	Change <Issen> to < <i>Eisen</i> > <i>Reason:</i> Spelling and italicization of case name
36	16	Add <action> between <class> and <was> to read as follows: <two years after the class action was filed but after the class was> <i>Reason:</i> Transcription error
36	21	Change <20(f)> to <23(f)> <i>Reason:</i> Transcription error
37	25	Change <PWCs> to <PWAs> <i>Reason:</i> Transcription error
41	9	Delete <had> <i>Reason:</i> Transcription error
41	12	Change <and> to <in> <i>Reason:</i> Transcription error
44	8	Change <guardily> to <guardedly> <i>Reason:</i> Spelling
44	10	Add a comma after <rights> and add a comma after <about> to read as follows: <would sweep in rights, that Mr. Levin-Gesundheit will talk about, covered by> <i>Reason:</i> Transcription error
45	18	Change <familiar> to <familial> <i>Reason:</i> Transcription error
46	14	Change <Honestly> to <Finally> <i>Reason:</i> Transcription error

<i>Page</i>	<i>Line</i>	<i>Change</i>
47	18	Change <ward> to <award> <i>Reason:</i> Transcription error
49	24	Change <I> to <I'll> to read as follows: <And I'll also say that> <i>Reason:</i> Transcription error
53	19	(1) change <near> to <mere>; and (2) move quotation mark to appear prior to word <class> to read as follows: <"class members are <b>mere</b> passive beneficiaries> <i>Reason:</i> Transcription error
55	19	Change <that's> to <that> to read as follows: <just two outlier cases <b>that</b> it cited> <i>Reason:</i> Transcription error
55	24	Change <Comes> to <Come> <i>Reason:</i> Transcription error
56	2	Change <enforcement> to <endorsement> to read as follows: <is really an <b>endorsement</b> of the arbitration> <i>Reason:</i> Transcription error
57	2	Change <could> to <should> to read as follows: <a current employee <b>should</b> step forward> <i>Reason:</i> Transcription error
57	9	Change <day> to <days> to read as follows: <up until the <b>days</b> before the class was certified> <i>Reason:</i> Transcription error
57	14	Delete comma between <referenced> and <what's> to read as follows: <not a single agreement referenced what's happening> <i>Reason:</i> Transcription error
57	11	Insert period after <showed> <i>Reason:</i> End of statement
57	23	Change <that's> to <that it's> to read as follows: <or that it's going to have any effect> <i>Reason:</i> Transcription error
58	2	(1) change <of the> to <where>; and (2) <has> to <is> to read as follows: <very different from the award plan itself <b>where</b> arbitration <b>is</b> underlined, bold, all caps.>

<i>Page</i>	<i>Line</i>	<i>Change</i>
		<i>Reason:</i> Transcription error
59	6	Change <presumably> to <actually> to read as follows: <It's an email, <b>actually</b> .> <i>Reason:</i> Transcription error
59	15	Change <or> to <and> to read as follows: <job titles at issue <b>and</b> the divisions> <i>Reason:</i> Transcription error
60	1	Change <receive> to <received> to read as follows: <when they <b>received</b> their stock award> <i>Reason:</i> Transcription error
60	4	Change <see an> to <seen in> to read as follows: <scrolled to the middle and <b>seen in</b> even smaller text that arbitration had been> <i>Reason:</i> Transcription error
60	17	Change <Louis> to <Luis> <i>Reason:</i> Spelling of plaintiff's name
61	9	Change <award> to <reward> to read as follows: <to <b>reward</b> them for the work performed> <i>Reason:</i> Transcription error
62	1	Change <broader> to <broad> to read as follows: <They have <b>broad</b> confidentiality provisions.> <i>Reason:</i> Transcription error
62	3	Change <attachment> to <action> to read as follows: <It was not paying for peace in this <b>action</b> .> <i>Reason:</i> Transcription error
67	13	Insert <the> after <of> <i>Reason:</i> Transcription error
73	12	Delete period after <23(d)> <i>Reason:</i> Transcription error
74	24	Change <MV> to <MD> <i>Reason:</i> Transcription error

<i>Page</i>	<i>Line</i>	<i>Change</i>
80	19	Change period to question mark to read as follows: <Where would we be if the Court had decided that a class of 1,800 was unmanageable but would have granted certification to a class of 1,000?> <i>Reason:</i> Transcription error
80	21	Change <mailed> to <emailed> to read as follows: <Goldman <b>emailed</b> out these equity award agreements in a misleading way> <i>Reason:</i> Transcription error
80	24	Change <mail> to <email> to read as follows: <The FAA doesn't give Goldman a free way to <b>email</b> out misleading clauses> <i>Reason:</i> Transcription error
81	4	Change <and> to <in> to read as follows: <these rights <b>in</b> this case are being relinquished here.> <i>Reason:</i> Transcription error
81	6	Add <we> between <and> and <might> to read as follows: <These are all things that Goldman did that Goldman could have done differently and <b>we</b> might have really had not much to talk about here today.> <i>Reason:</i> Transcription error
81	16	Change <Under> to <Section> <i>Reason:</i> Clarification
81	23	Change <awarded> to <rewarded> <i>Reason:</i> Transcription error
83	3	Change <his> to <its> to read as follows: <This is a situation where the defendant actually reserved <b>its</b> right> <i>Reason:</i> Transcription error
83	11	Delete <an> appearing between <and> and <evidence> to read as follows: <there was a reservation of the right and evidence of an interest to preserve the right.> <i>Reason:</i> Transcription error
89	13-14	Change attribution from Mr. Giuffra to the Court for the following sentence: <Thank you all for an excellent and interesting argument.> <i>Reason:</i> Transcription error